

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Joe N Miles & Sons Inc  
Joe N Miles & Sons - Miles Bogalusa Mill  
Bogalusa, Washington Parish, Louisiana  
Agency Interest Number: 17316  
Activity Number: PER20020001  
Proposed Permit Number: 3060-00022-V2**

**I. APPLICANT**

**Company:**

Joe N Miles & Sons - Miles Bogalusa Mill  
PO Box 158  
Bogalusa, Louisiana 70429-0158

**Facility:**

Joe N Miles & Sons Inc  
Varnado Hwy 21 N  
Bogalusa, Washington Parish, Louisiana  
Latitude: 30° 51' 14" 02 Longitude: 89° 50' 01" 32

**II. FACILITY AND CURRENT PERMIT STATUS**

The Joe N. Miles & Sons, Inc. Bogalusa Saw Mill is located in Bogalusa, Louisiana. Finished, dimensioned lumber is produced from southern yellow pine logs which are delivered to the facility. The production of dimensioned lumber involves three major production processes: Rough Cutting, Drying, and Planning and Finishing.

The Joe N. Miles & Sons, Inc., Miles Bogalusa Mill currently operates under Permit No. 3060-00022-V1, issued July 12, 2002.

**III. PROPOSED PROJECT/PERMIT INFORMATION**

**Application**

A permit application and Emission Inventory Questionnaire were submitted by Joe N. Miles & Sons, Inc. on May 24, 2002 requesting a Part 70 operating permit renewal. Additional information dated December 4, 2006 and October 20, 2008 was also received.

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**Project**

This permit is the renewal to the Part 70 operating permit No. 3060-00022-V1 issued July 12, 2002. Increases or decreases in emissions are due to updated emission factors that were used in emission calculations using the same throughputs as the current permit.

**Proposed Permit**

Permit 3060-00022-V2 will be the renewal of Part 70 operating permit 3060-00022-V1 for the Miles Bogalusa Mill.

**Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	73.59	75.60	+ 2.01
SO <sub>2</sub>	1.27	4.30	+ 3.03
NO <sub>x</sub>	25.19	84.17	+ 58.98
CO	222.47	102.19	- 120.28
VOC *	284.37	283.65	- 0.72

**\*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
1,2-Dichloropropane	0.0	0.006	+ 0.006
1,2-Dichloroethane	0.0	0.005	+0.005
2,4,6-Trichlorophenol	0.0	<0.001	+ <0.001
2,4-Dinitrophenol	0.0	<0.001	+ <0.001
2-Methylnaphthalene	0.0	<0.001	+ <0.001
Methyl Ethyl Ketone	0.0	<0.001	+ <0.001
4-Nitrophenol	0.0	<0.001	+ <0.001
Acetaldehyde	2.678	2.788	+ 0.110
Acetophenone	0.0	<0.001	+ <0.001
Acrolein	0.203	0.883	+ 0.680

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**\*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After	Change
Benzene	0.254	0.806	+ 0.552
Carbon tetrachloride	0.0	0.008	+ 0.008
Chlorobenzene	0.0	0.006	+ 0.006
Chloroform	0.0	0.005	+ 0.005
Dioxins and furans (D/F)	<0.001	<0.001	0.0
Ethyl benzene	0.0	0.005	+ 0.005
Formaldehyde	0.220	0.834	+ 0.614
Methanol	7.797	7.797	0.0
Methyl bromide	0.0	0.002	+ 0.002
Methyl chloride	0.0	0.004	+ 0.004
Methyl isobutyl ketone	0.233	0.234	+ 0.001
Naphthalene	0.055	0.016	- 0.039
Phenol	0.531	0.538	+ 0.007
Polychlorinated biphenyls	0.0	<0.001	+ <0.001
Propionaldehyde	0.374	0.384	+ 0.010
Styrene	0.0	0.323	+ 0.323
Toluene	0.171	0.328	+ 0.157
Trichloroethylene	0.0	0.005	+ 0.005
Vinyl chloride	0.0	0.003	+ 0.003
Xylene (mixed isomers)	0.116	0.121	+ 0.005
bis(2-ethylhexyl) phthalate	0.0	<0.001	+ <0.001
Pentachloro-Phenol	0.0	<0.001	+ <0.001
Total	12.632	15.101	+ 2.469

Other VOC (TPY): 268.55

**Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After	Change
1,1,1-Trichloroethane	0.0	0.005	+ 0.005
Arsenic	<0.001	0.004	+ 0.004

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**Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After	Change
Barium	0.0	0.029	+ 0.029
Beryllium	0.0	<0.001	+ <0.001
Cadmium	< 0.001	<0.001	0.0
Chlorine	0.128	0.134	+ 0.006
Chromium VI	0.002	0.004	+ 0.002
Cobalt	0.002	<0.001	- 0.002
Copper (and compounds)	0.0	0.008	0.0
Dichloromethane	0.0	0.049	+ 0.049
Hydrochloric acid	0.0	3.231	+ 3.231
Lead compounds	0.005	0.008	+ 0.003
Manganese	0.206	0.272	+ 0.066
Mercury	<0.001	<0.001	0.0
Nickel (and compounds)	0.001	0.006	+ 0.005
Phosphorus	0.0	0.005	+ 0.005
Selenium	<0.001	<0.001	0.0
Tetrachloroethylene	0.0	0.006	+ 0.006
Zinc (and compounds)	0.0	0.071	+ 0.071
Total	0.344	3.832	+ 3.488

#### IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

##### Applicability and Exemptions of Selected Subject Items

Below are regulations exempted for the selected subject items in the table below. The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit.

ID No.	Requirement	Note
EQT 1 P1 (A-H) – Kiln #1 (8 vents)	Emission Standards for Sulfur Dioxide Emission Limitations [LAC 33:III.1503.C]	DOES NOT APPLY

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EQT 2 P2 (A-H) – Kiln #2 (8 vents)	Emission Standards for Sulfur Dioxide Emission Limitations [LAC 33:III.1503.C]	DOES NOT APPLY
EQT 3 P3 (A-H) – Kiln #3 (8 vents)	Emission Standards for Sulfur Dioxide Emission Limitations [LAC 33:III.1503.C]	DOES NOT APPLY
EQT 4 P4 (A-H) – Kiln #4 (8 vents)	Emission Standards for Sulfur Dioxide Emission Limitations [LAC 33:III.1503.C]	DOES NOT APPLY
EQT 5 C5 – Planer Cyclone (Planer, Pulverizer)	Compliance Assurance Monitoring [40 CFR Part 64]	DOES NOT APPLY. The Planer Cyclone is an inherent process equipment; and therefore, it is not considered a Control device as defined in §64.1.
EQT 6 C7 – Silo Cyclone (Grinder)	Compliance Assurance Monitoring [40 CFR Part 64]	DOES NOT APPLY. The Silo Cyclone is an inherent process equipment; and therefore, it is not considered a Control device as defined in §64.1.
EQT 7 P8-Babbit # 3 Melting Hood	Control of Emissions of Carbon Monoxide (New Sources) – Ferrous Metal Emissions [LAC 33:III.1703.A]	EXEMPT. Source constructed before 1987.
EQT 8 P9-Babbit # 4 Melting Hood	Control of Emissions of Carbon Monoxide (New Sources) – Ferrous Metal Emissions [LAC 33:III.1703.A]	EXEMPT. Source constructed before 1987.
EQT 10 T3-1000 Gallon Gasoline AGST	Control of Emission of Organic Compounds – Filling of Gasoline Storage Vessels [LAC 33:III.2131.A]	EXEMPT. Gasoline Tank is equipped with a submerged fill pipe.

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EQT 10 T3-1000 Gallon Gasoline AGST	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Gasoline Tank constructed before July 23, 1984.
EQT 11 T3-1000 Gallon Gasoline AGST	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Gasoline Tank constructed before July 23, 1984.

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**Prevention of Significant Deterioration/Nonattainment Review**

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations: New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD), and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

**MACT Requirements**

The facility is a minor source of TAPs/HAPs. There are no MACT requirements.

**Air Quality Analysis**

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS.

Dispersion Model(s) Used: AERMOD

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Acrolein	8hr	3.25 ug/m3	5.40 ug/m3
HCl	8hr	11.9 ug/m3	180 ug/m3
Manganese	8hr	1.00 ug/m3	4.76 ug/m3
PM <sub>10</sub>	24hr	131 ug/m3	150 µg/m <sup>3</sup>

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

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**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**IV. PERIODIC MONITORING**

NA

**VII. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H<sub>2</sub>S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO<sub>x</sub>) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)



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Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub> – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air

Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.